

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**DREW J. RIBAR,**

Plaintiff,

v.

**WASHOE COUNTY, NV, et al.,**

Defendants.

**Case No.: 3:24-cv-00526-ART-CSD**

**PLAINTIFF’S MOTION FOR PROTECTIVE ORDER UNDER FRCP 26(c)**

Plaintiff Drew J. Ribar, pro se, moves for a protective order under FRCP 26(c) to quash Defendant Washoe County’s Request for Production No. 28 (served 03/04/2025), seeking “all documents, including transcripts, archives, history, and chat logs, of generative AI and/or ChatGPT regarding this Case,” as it requests privileged work-product and is unduly burdensome.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**1. LEGAL STANDARD**

FRCP 26(c)(1) permits protective orders to prevent undue burden or protect privileged materials. Work-product includes materials reflecting mental impressions (\*Hickman v. Taylor\*, 329 U.S. 495, 510–11 (1947)), extending to pro se litigants (\*In re Grand Jury Investigation\*, 974 F.2d 1068, 1071 (9th Cir. 1992)). Discovery must be proportional and relevant (FRCP 26(b)(1); \*Zubulake v. UBS Warburg LLC\*, 217 F.R.D. 309, 316 (S.D.N.Y. 2003)).

## 2. FACTUAL BACKGROUND

RFP No. 28 seeks 300-500 pages of AI chat logs used for legal research and strategy (Exhibit E, RAF 56; Exhibit F, Interrogatory 20). Plaintiff's injuries (Exhibits A–C, 03/20–04/16/2025) and four lawsuits (Exhibit F, Interrogatory 7) make compilation burdensome. The logs are irrelevant to the Complaint's claims, probing only Plaintiff's drafting process.

## 3. ARGUMENT

- **Work-Product Privilege**: The logs reflect legal theories, protected as work-product (\*Wiley v. Calcagni\*, 2010 WL 2977795, at \*3 (D. Conn. 2010); \*Sporck v. Peil\*, 759 F.2d 312, 316 (3d Cir. 1985)).
- **Undue Burden**: Reviewing 190–350 pages is disproportionate, given injuries (Exhibits A–C; \*Zubulake\*, 217 F.R.D. at 316).
- **Irrelevance**: The logs do not address claims (FRCP 26(b)(1)).

## 4. RELIEF REQUESTED

Plaintiff requests RFP No. 28 be quashed or production limited after in camera review (\*Upjohn Co. v. United States\*, 449 U.S. 383, 395–96 (1981)).

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2 Dated: April 23, 2025

3 Respectfully submitted,

4 /s/ Drew J. Ribar

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6 Drew J. Ribar, Pro Se

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13 **CERTIFICATE OF SERVICE**

14 I certify that on April 23, 2025, I served this MOTION via CM/ECF or U.S. mail to:

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/s/ Drew J. Ribar

Drew J. Ribar, Pro Se